

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION

Case No. 3:23-md-03084-CRB

**DECLARATION OF ROOPAL P.
LUHANA IN SUPPORT OF CHAFFIN
LUHANA LLP'S MOTION TO
WITHDRAW AS COUNSEL FOR
PLAINTIFF B.F.**

This Document Relates to:

PLAINTIFF B.F.
Case No. 3:25-cv-04466

I, Roopal P. Luhana, declare:

1. I am an attorney and partner in the law firm of Chaffin Luhana LLP. I am a member of the State Bar of New York and am admitted Pro Hac Vice to practice before this Court. I make this declaration based on my own personal knowledge. If called upon to testify, I could and would testify competently to the truth of the matters stated herein.

2. Plaintiff B.F. has not substantively responded to any efforts to reach her made by my firm since August 1, 2025.

3. Plaintiff B.F.'s breakdown in communication with our firm has presented a circumstance covered by Rule 1.16(b)(4) of the California Rules of Professional Conduct. We are unable to meet discovery deadlines and otherwise prosecute her case without her input. It is my opinion that our withdrawal from the case has become necessary and is appropriate.

4. Under California Rule of Professional Conduct 1.16(d), my firm has taken all reasonably available steps to avoid prejudice to the rights of Plaintiff B.F.

a. Before and throughout the time period described below, Plaintiff B.F. received numerous letters, emails, text messages, and telephone calls requesting she contact our firm. In these

1 unanswered communications, we repeatedly explained the need for her continued participation in the
2 case, the risk that her case may be dismissed, the reasons we would need to withdraw as counsel absent
3 contact.

4 b. On July 29, 2025, July 30, 2025, and July 31, 2025 my firm attempted to call Plaintiff
5 with no answer. On July 31, 2025 my firm sent Plaintiff an email with no response.

6 c. On August 1, 2025, my firm sent Plaintiff a letter via email and FedEx informing her
7 of my firm's contact efforts and informing her of the impossibility of moving forward if we do not
8 hear from her. My firm informed Plaintiff that if we did not hear back from Plaintiff by August 8,
9 2025, and receive the necessary documentation required to move her case forward, we would have no
10 choice but to withdraw as counsel for her case.

11 d. On August 1, 2025, Plaintiff responded to an email sent on August 1, 2025 requesting
12 she contact my firm immediately. August 4, 2025 and August 6, 2025 my firm emailed Plaintiff with
13 no response.

14 e. On August 6, 2025 and August 7, 2025, my firm attempted to call Plaintiff multiple
15 times with no answer. On August 6, 2025, my firm sent a text message to Plaintiff with no response.

16 f. On August 6, 2025 we were informed that the FedEx letters were successfully
17 delivered.

18 5. To date, my firm has not yet heard from Plaintiff since August 1, 2025.

19 6. On August 7, 2025, my firm secured an extension for Plaintiff's deadlines.

20 7. My firm informed Plaintiff on August 1, 2025 that we would move to withdraw as counsel.

21 8. Our withdrawal from this case will not impact the timing or schedule of this litigation, and we
22 have taken all reasonable steps possible to avoid prejudice to Plaintiff and informed her of the
23 consequences of failing to comply with case deadlines.

24 9. On August 12, 2025, my firm informed Defendant of its intent to withdraw as counsel for
25 Plaintiff.

26 10. I understand that pursuant to Local Rule 11-5(b), leave to withdraw may be conditioned on our
27 firm continuing to accept papers to forward to the client. My firm accepts this responsibility.

28 Executed this 13th day of August, 2025, in New York, New York.

/s/ Roopal P. Luhana

Roopal P. Luhana

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